



BASSFORD REMELE

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June 27, 2022

Via ECF

The Honorable Tony N. Leung
United States Magistrate Judge
United States District Court
300 South Fourth Street
Minneapolis, MN 55415

Re: *Thomas Hunziker, as Trustee for the Next-of-Kin of ALH v. Patricia Doherty, et al.*
Court File No. 20-CV-2188

Dear Judge Leung:

I represent Defendants Robert Marshall, M.D., Kristin Medhanie, and Allina Health System. I am submitting this letter following last Friday's status conference to confirm that Allina is withdrawing—without prejudice—its Motion for Protective Order related to Plaintiff's Rule 30(b)(6) deposition notice to Allina (ECF No. 177), as well as its Motion for Protective Order relating to the deposition of Amie Penny-Sayler (ECF No. 182).

Allina is withdrawing these motions because, as discussed during the status conference, the parties have agreed to temporarily halt further discovery pending the distribution hearing scheduled for July 28, 2022, and potentially related orders from Judge Brasel. Accordingly, the depositions at issue in the motions have been postponed. If those depositions are rescheduled, Allina reserves all rights to re-file its motions.

Please let me know if you have any questions or if you need anything else to effectuate the withdrawal of the motions without prejudice.

Thank you for your consideration of this matter.

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Very truly yours,

s/ Mark R. Bradford

Mark R. Bradford

/MRB

cc: All counsel of record (via ECF)